



Partners
Dawn M. Cardi
Chad L. Edgar

Associates
Jessica Friedrich
Joanna C. Kahan

Of counsel
Diane Ferrone

November 30, 2022

Via ECF

Hon. J. Paul Oetken
United States District Court Judge
Southern District of New York
40 Foley Square
New York, NY 10007

Re: United States v. Ahmad Akbar, 20-cr-563 (JPO)

Your Honor:

I am CJA counsel to Ahmad Akbar. I write, with no objection from pre-trial services, to request a one-time modification to Mr. Akbar's bail to permit him to travel to Atlanta, Georgia for a brief 3-day vacation in December 2022. The Government has informed counsel that it defers to pre-trial services.

Mr. Akbar has been on pre-trial release since December 12, 2020. On August 6, 2021, the Court removed Mr. Akbar's bail conditions of curfew with location monitoring. This is Mr. Akbar's first request for permission to travel. In informing counsel that he has no objection to this request, Pre-Trial Services Officer Marlon Ovalles also noted that Mr. Akbar continues to report as direct.

Should the Court approve the instant request, Mr. Akbar will provide a full itinerary to Pre-Trial Officer Ovalles.

Accordingly, we respectfully request that the Court modify Mr. Akbar's current bail conditions to permit him to travel to Atlanta, Georgia for a 3-day vacation in December 2022. As noted, pre-trial services has no objection to this request and the Government has indicated that it defers to pre-trial.

I thank the Court for its attention to this matter.

Granted.
So ordered.
11/30/2022

Respectfully submitted,

/s/

Dawn M. Cardi

J. PAUL OETKEN
United States District Judge